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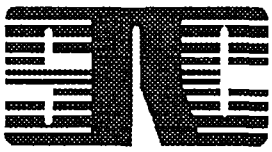

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MEMORANDUM

To Jim Christiansen
cc Jeff Montera (CDM)
From Bill Brattin
Date 05/02/02

RE Comments on Interim Final Draft SAP for Libby OU 4

Jim

As you requested, I have reviewed the Interim Final Draft Sampling and Analysis Plan for Libby Operable Unit 4 I focused my attention mainly on those areas where I provided comments in the preceding version My comments on this version are provided below

Section 1 0 The overview of the plan is much better, but still does not include any discussion of the pragmatic factors (especially cost) that have gone into the basic design These concepts are a key part of the logic and justification for the design and need to be added The tech memos that you have asked me to prepare will help with this, but the text still needs to explain the basic issues and the approach selected

Section 1 1 Isn't identification of properties that require remediation the primary (not a secondary) goal of the study?

Section 2 2 (last paragraph) The test says the study will identify properties with primary sources that require immediate cleanup, as well as "identifying properties which may require further risk-based investigation" I am not clear on this idea What are the attributes of a property that will not be remediated now but which may require further investigation? Detectable asbestos by IR but at less than 1%? If so, maybe you can just fine a place to spell this out more clearly

Section 2 4 (last bullet) It is not correct to say that the relationship between asbestos and lung cancer is not known Essentially every health and regulatory agency in the word ranks asbestos inhalation as a known cause of lung cancer in humans

Section 3 I think moving the DQOs to Section 3 is a good idea However, I am not very excited about abandoning the traditional 7-step structure that guides the DQO process If it were true that many of the steps are irrelevant to this project and it is just busy work putting in some useless words, I would have no concern over a consolidated "here is what is relevant" approach However, I think that some of the basic steps still have to be worked through to develop the logic which justifies the approach selected Some specific thoughts follow

- The current write up never really talks about the decision(s) that will be made from the data Perhaps you feel that this info has been presented before, but I think it would help to re-state it here very clearly

- The decision rules are fairly clearly presented, but the justification for those rules is missing This justification has two parts how do you know that it is necessary to clean up primary sources (concentration > 1%)? Do this by cross-referencing and/or abstracting from Chris's risk memos

- The text says "Use of a statistical sampling design was considered but was not deem[ed] appropriate for the purposes of this study" I assume this refers to my previous comment about the justification for soil sampling design I do not wish to imply that some big fancy statistical analysis is needed, but to blow off the whole issue with the sentence above is just asking for trouble

- The lack of specificity of the IR method for fibrous asbestos needs to be discussed in the main text (so people like me do not get all excited about false positives) If the SOP for IR includes a good discussion of the issue as well as an effective "confirmation" step, all you have to do is mention the issue and cross reference the SOP If the SOP does not contain the details of a confirmation step then the text must address this directly and in detail

Section 4 1 As we discussed, I feel that you might be very unhappy in the long run if you refer to a property with no asbestos detectable by eye or by IR as "clean"

Section 4 1 The text says "Property does not have primary sources of LAA but there are indications that secondary sources are, or may be present Further investigation may be required to determine if cleanup activities are necessary" Maybe I am missing the boat, but I think this needs a lot more explanation What are the "indications"? An IR value of 0 4%? A person with asbestos-related disease? If such an indication is present, what "further investigations" may be required, and how would a decision be made that remediation is needed? If the idea is that any property with the appropriate "indications" is put in a bin called "we will figure that out later, and it is not really part of the current plan", then that has to be very clear (Note that this would not make the residents at such a property very happy) If figuring out what to do at such properties is a part of this program, then I think this needs be thought through in detail and spelled out in this document

Section 7 1 3 The text regarding accuracy mentions LCS and PE samples, with no detail on what these are I know that all that is still pending, but do not forget to add key details as soon as possible The text should specify the nature of the material in the LCS/PE samples and the nominal concentration values